

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
FAYETTEVILLE DIVISION

JILL DILLARD, ET AL.

PLAINTIFFS

VS.

NO. 17-CV-05089-TLB

KATHY O'KELLY, ET AL.

DEFENDANTS

ORAL DEPOSITION

OF

JEREMY VUOLO

TAKEN MAY 26 2021, AT 10:00 A.M.

Bushman Court Reporting

A P P E A R A N C E S

ON BEHALF OF THE PLAINTIFF:

MR. STEVEN BLEDSOE
LARSON, LLP.
555 SOUTH FLOWER STREET, SUITE 4400
LOS ANGELES, CALIFORNIA 90071
SBLEDSOE@LARSONLLP.COM

ON BEHALF OF THE DEFENDANTS:

MR. JASON OWENS
JASON OWENS LAW FIRM, P.A.
P.O. BOX 850
CONWAY, ARKANSAS 72033-0850
OWENS@JOWENSLAWFIRM.COM

MS. MORGAN DOUGHTY
HARRINGTON MILLER LAW FIRM
4710 SOUTH THOMPSON, STE.102
SPRINGDALE, ARKANSAS 72764
MDOUGHTY@ARKANSASLAW.COM

1 A Yes.

2 Q Okay. Just from what I've seen, the show, they -- they
3 refer to that as courting; is that right?

4 A Yes.

5 Q And what's the difference between courting and, let's say,
6 dating?

7 A They would say it's more intentional.

8 Q How so?

9 A I'm not sure.

10 Q Okay. You had dated other girls before your wife, right?

11 A Yes.

12 Q How was the experience of courting your wife different
13 from dating other girls before her, in terms of form and
14 structure? I don't mean -- I'm not asking about feelings and
15 things like that. Okay? I just want to understand the
16 difference in the way you go about it.

17 A I can't say for sure because everyone's different. Yeah,
18 I can't say for sure. For me and Jinger, it was just a lot
19 more, I think, respectful of the parents.

20 Q And so, did y'all have chaperones on your outings?

21 A Yes.

22 Q Was physical contact between the two of you expressly
23 limited during that period?

24 A What do you mean?

25 Q Well, in other words, did you understand you weren't to

1 kiss or things like that?

2 A Yes.

3 Q Okay. And so, how long did this courting process last
4 until you propose to your wife?

5 A Approximately three months.

6 Q Okay. And then how long from there to the wedding date?

7 A Approximately three months.

8 Q Okay. That seems to be the norm with the Duggar children.
9 And what I mean by that is that their courting periods,
10 engagement periods, seem to be short; is that fair?

11 A I don't have an opinion on that.

12 Q Well, I'm not asking you for an opinion. You know how
13 long they're -- what would you say the average is for a
14 courting period for one of the Duggar children?

15 A I haven't done the math on that.

16 Q Do you know anybody else, how long they were?

17 A Some over a year, some less than a year. So, I -- I just
18 would have to ask them.

19 Q Okay. I got you. Kind of all over the place, is what
20 you're saying.

21 A Sure.

22 Q What about engagement periods? Are those -- anybody
23 longer than six months from proposal to wedding day?

24 A I'm not sure.

25 Q Okay. So, this lawsuit, as you no doubt know on some

1 Q Sure. Did y'all talk at all about -- in premarital
2 counseling or anytime before your marriage, your wedding, about
3 her being abused or molested by her brother?

4 A Not in premarital counseling.

5 Q Okay.

6 A I'm not sure if we did before the wedding.

7 Q Has she -- up until today, has she ever told you that
8 she's been abused physically or sexually at any other time?

9 A No.

10 Q Okay. Do y'all have children?

11 A Yes.

12 Q How many?

13 A Two.

14 Q What are their ages?

15 A Almost 3 and 6 months.

16 Q Okay. Both boys, both girls, or one of each?

17 A Both girls.

18 Q Okay. The Duggars sort of pretty famously ascribe to what
19 I've heard labeled as the Quiverfull philosophy, that basically
20 you have as many children as the Lord allows. Do you and your
21 wife ascribe to that same philosophy?

22 A No.

23 Q Okay. The -- the Duggars -- and by the Duggars, I'm
24 referring to Jim Bob on the show -- have pretty definite ideas
25 -- just based on my kind of casual observation -- pretty --

1 pretty definite ideas about most everything, best I can tell,
2 but certainly about the way a family ought to operate. Much of
3 that is derived from their faith. But they certainly seem to
4 have very definite ideas, wouldn't you agree?

5 MR. BLEDSOE: Objection. Argumentative,
6 vague and ambiguous, compound.

7 Q So, let me stop right here. Just one second, Jeremy.

8 MR. OWENS: Yesterday, we did have a
9 conference, Steven, with the judge who -- I
10 don't know if asked is the right word, but at
11 least he asked that we not engage in speaking
12 objections. I would ask that you limit your
13 objections moving forward to the form of the
14 question. We'll stipulate that that preserves
15 all objections for trial.

16 Q So, go ahead.

17 MR. BLEDSOE: That's what I did. What are
18 you talking about?

19 MR. OWENS: Well, you're giving -- you're
20 speaking your objections. The only proper
21 objection to my understanding, and I think this
22 is what Judge Brooks said yesterday, is
23 objection to the form of the question.

24 MR. BLEDSOE: Okay. Okay. That must be
25 how you do it in Arkansas.

1 MR. OWENS: Sure. Thank you.

2 Q All right. Jeremy, did you understand my question?

3 A Could you repeat it or --

4 Q Yeah. So, it appears to me that Jim Bob and Michelle have
5 very definite ideas about how they live their lives,
6 particularly with respect to the operation of the family.
7 Would you agree with that?

8 MR. BLEDSOE: Object to the form of the
9 question.

10 A Yeah. I'm not sure.

11 Q It's not hard to figure out where they stand on the way a
12 family ought to work, right?

13 MR. BLEDSOE: Object to the form of the
14 question.

15 A Yeah, I don't have an opinion on that.

16 Q Okay. Is there anything related to the operation of the
17 family or sort of the living of one's own life that you would
18 disagree with Jim Bob and/or Michelle about?

19 MR. BLEDSOE: Object to the form of the
20 question.

21 A Um.

22 Q So, let me strike that and ask it a different way. I
23 think you just told me that you don't ascribe to this idea that
24 a Christian couple, family, should have as many children as
25 they can, but that Jim Bob and Michelle do; is that correct.

1 A I can't speak for them. I can speak for myself.

2 Q Okay.

3 A I don't hold a conviction that says I need to have as many
4 children as I can.

5 Q Okay. Conviction is a good word. So, are there any
6 convictions that you're aware of that Jim Bob and Michelle have
7 that you and Jinger don't share?

8 MR. BLEDSOE: Object to the form of the
9 question.

10 A Yes.

11 Q Okay. Are Jim Bob and Michelle aware of that difference
12 in conviction?

13 MR. BLEDSOE: Object to the form of the
14 question.

15 Q Have they ever expressed any opinions about any different
16 convictions that you and your wife have versus their own.

17 A Yes.

18 Q When was that?

19 A I'm not sure.

20 Q Okay. And what did they say?

21 A I'm not sure.

22 Q What was the disagreement or difference in conviction that
23 they expressed an opinion about?

24 A I'd say they've -- they've -- I'm trying to think of --
25 yeah. It -- they've spoken to us about -- what was it -- I

1 guess modesty is one. We've had a couple of conversations.

2 Q Jinger chooses to wear pants on occasion, doesn't she?

3 A Yes.

4 Q And Michelle never does, to your knowledge, does she? In
5 public?

6 A Not to my knowledge. Okay.

7 Q Have they told you that they think Jinger ought to be
8 wearing skirts and dresses instead of pants?

9 A No.

10 Q Okay. But they do -- is that the question of modesty that
11 they talk to you about; pants versus skirts?

12 A In a way, yes. I mean, not that exact word --

13 Q Yeah. So, what did they say? I don't want to put words
14 in your mouth. I just want you to tell me.

15 A They just shared their -- their thoughts on -- on -- on
16 women wearing dresses, I guess.

17 Q Okay. And that they think that's the best way, right?

18 A They've not worded it that way.

19 Q How did they word it?

20 A I don't recall. Just -- I think -- yeah, I don't recall
21 exactly.

22 Q You don't -- you don't recall, but you know they didn't
23 word it the way I said it?

24 A Yeah.

25 Q Okay.

1 A They've never said "this is the best way."

2 Q Okay. But you don't -- you know they didn't say that, but
3 you don't recall what it was they said.

4 A Yeah. I remember Mrs. Duggar just sharing her own
5 personal journey of modesty.

6 Q Okay. You would certainly disagree with any notion that
7 your wife dresses in an immodest way, wouldn't you?

8 A Yes.

9 Q Okay. Okay. When Jim Bob and Michelle shared with you
10 their thoughts on modesty as it related to the way women
11 dressed, were they upset with you about it, or Jinger?

12 A I would need to speculate their -- their emotions.

13 Q Okay. They weren't visibly upset?

14 A No.

15 Q Okay. Any other areas where they've expressed
16 disagreement with sort of the way y'all are running your family
17 or living your lives?

18 A Not that I can recall.

19 Q Okay. I need to ask you about something difficult. Let
20 me just say, you know, I'm sort of compelled to do this. I'll
21 tell you on the front end, I've been through this, too, and so
22 I understand the emotion involved with this.

23 But my understanding is that y'all have had a miscarriage
24 in the last few years.

25 A Yes.

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1 Q Do you get paid for operating any of those social media
2 accounts?

3 A No.

4 Q Okay. Are either or both of you social media influencers?

5 A I'm not sure.

6 Q Okay. What -- what platforms do y'all have accounts on?

7 A Twitter, Instagram, Facebook. I believe Jinger might have
8 a TikTok.

9 Q Okay.

10 A That's it.

11 Q Different people have social media accounts for different
12 reasons. Why do y'all have your social media accounts?

13 A Primarily to share the hope of Christ.

14 Q Okay. Evangelism, right?

15 A Sure.

16 Q You've told me about preaching at the college ministry and
17 you're a research assistant. How much do you get paid for
18 being a research assistant?

19 A I'm not sure.

20 Q Okay. I would assume that's not a particularly lucrative
21 position; is that fair?

22 A (No verbal response.)

23 Q Okay. You know what you make as a -- as a preacher of the
24 college ministry?

25 A Nothing.

1 Q Okay. That's a volunteer position?

2 A Yes.

3 Q Any other sources of income for your household?

4 A Yes.

5 Q What are your other sources of income?

6 A The show is a source of income.

7 Q How much income do y'all realize from the show?

8 A I'm not sure.

9 Q Okay.

10 A The -- there are paid partnerships. And my wife and I
11 authored a book.

12 Q That was released recently, wasn't it?

13 A It was.

14 Q What's the name of that?

15 A *The Hope We Hold: Finding Peace in the Promises of God.*

16 Q Okay. You mentioned paid partnerships. Who do you have
17 paid partnerships with?

18 A I don't recall all of them.

19 Q Do you recall any of them?

20 A Yeah. My wife has done some with a company MyBrushX.

21 Q What do they do?

22 A I'm not sure all they do. I know she's done an advert
23 for, like a hair thing.

24 Q Got you. Any others that you're aware of as far as paid
25 partnerships?

1 A I'm not sure all of the ones. There's others of that
2 nature. There was a tooth one. There was -- man, I'm
3 blanking. There was one that -- yeah. I don't recall all of
4 them.

5 Q Are all of them in the nature of Jinger endorsing a
6 product?

7 A I believe so.

8 Q Okay. Do you endorse any products --

9 A I --

10 Q -- for compensation, or have you?

11 A Once, yeah. Just once, I think.

12 Q What was that?

13 A I don't recall the name of the product, but it was a --
14 like a headphone product.

15 Q Got you. When you or Jinger do these endorsements, is
16 that a lump sum payment that you receive, or are there
17 royalties, or how does that work?

18 A I believe it's lump sum.

19 Q Okay. You mentioned the book. Did y'all -- was that a
20 lump sum payment? Are you going to receive royalties on that
21 book?

22 A There's -- yeah, there's variables to that?

23 Q Okay. What kind of advance did y'all get and how much?

24 A I'm not sure exactly how much we got.

25 Q Okay. Have you received any royalty checks yet?

1 A No.

2 Q Do you receive any government or charitable assistance?

3 A Not that I'm aware of.

4 Q Do you know whether you qualify for any such assistance?

5 A Not that I'm aware of. I don't know if the checks that
6 everyone was getting -- the stimulus -- during COVID we did
7 receive.

8 Q No, I understand. I'm really -- I promise you, I'm really
9 not trying to trick you. I'm just trying to figure out --

10 A Okay.

11 Q -- what your situation is.

12 A (Indiscernible).

13 Q Yeah. No. I understand you got the stimulus checks just
14 like everybody else. So, okay. Has Jinger ever shared with
15 you what she thinks the defendants in this lawsuit did wrong?

16 A Yes.

17 Q What did she tell you?

18 A I don't recall all of the details.

19 Q Do you recall anything about what she said?

20 A Yes.

21 Q What did she say?

22 A I don't recall her exact words. The nature of it is
23 releasing classified or private information.

24 Q Okay. What private information?

25 A I don't recall the nature of the information, but

1 certainly about having to do with -- having to do with things
2 in her life that were meant to be private.

3 Q Do you think the public ought to know when a sexual
4 predator commits multiple acts of sexual abuse against
5 children?

6 A I'm not sure.

7 MR. BLEDSOE: Object to the form of the
8 question.

9 Q Okay. Do you think Josh Duggar is a sexual predator?

10 A I'm not sure.

11 MR. BLEDSOE: Okay. So, this is -- this is
12 harassing honestly. These are not questions
13 designed -- many, about half your questions are
14 in no way designed to get evidence to be used in
15 trial or -- please.

16 MR. OWENS: Well, we can agree to disagree
17 on that, I guess.

18 MR. BLEDSOE: Why don't we -- why don't we
19 take our first break? We've been going more
20 than an hour and a half.

21 MR. OWENS: Let me -- let me -- I want to
22 ask one more question.

23 Q Jeremy, do you feel like I'm trying to harass you?

24 MR. BLEDSOE: Okay. Jeremy, you don't have
25 to answer that question. That's not an

1 like that because I think it's counterproductive, but you let
2 me know. Okay?

3 A (No verbal response.)

4 Q You're not a lawyer so you wouldn't know this, but one of
5 the elements and one of the claims, at least one of the claims
6 made by your wife and the other plaintiffs in this case, is the
7 public interest in the subject matter of the disclosure. Do
8 you think that the public has a legitimate interest in knowing
9 the identity of sex offenders?

10 MR. BLEDSOE: Object to the form of the
11 question.

12 A I'm not sure.

13 Q Okay. Would you want to know if a sex offender moved in
14 next door?

15 MR. BLEDSOE: Object to the form of the
16 question.

17 A Yeah, it depends on the variables.

18 Q So, my understanding is you and your wife think that the
19 information that was disclosed related to Josh's molestation of
20 his sisters and maybe one other, was private and should have
21 been kept private; is that fair?

22 MR. BLEDSOE: Object to the form of the
23 question.

24 A Can you reword that?

25 Q Yeah. So, what is it you object to in this -- what --

1 too, growing up.

2 Q Do you come from a big family?

3 A No. I -- just two siblings.

4 Q Yeah.

5 A Two others, so three of us, but --

6 Q Okay.

7 A Yeah. I think that, from what I recall, that would
8 probably be the extent of it. They would hold hands and stuff
9 in public and make sure because they have so many kids that,
10 you know, you make sure your buddies are there and that kind of
11 thing.

12 Q Okay. Did she enjoy that, resent it, ambivalent?

13 A Yeah. You'd have to ask her.

14 MR. BLEDSOE: Object to the form. Sorry.

15 A Yeah. You'd have to ask her.

16 Q She hadn't told you that she resented it or enjoyed it or
17 anything in between?

18 A No. Not that I recall.

19 Q Okay. How often do y'all get to Arkansas to visit her
20 family?

21 A It's not on a -- not on a schedule. We went for a couple
22 of weddings recently. So, I think we've been twice this year.
23 And we visited them last summer.

24 Q Okay. If you combined all your sources of household
25 income, how much do you all make a month or a year, however you

1 would know it?

2 A I'm not exactly sure the number.

3 MR. BLEDSOE: You can estimate on that one.

4 Q Yeah.

5 A Sheesh, I need -- I should -- I should be a better
6 accountant. Definitely over 100,000, probably in -- probably
7 200,000 range.

8 Q Okay. And so, does -- you talked about the limited income
9 that you're making as a research assistant and a preacher at
10 the college ministry. Does -- does most of that income come in
11 then through the TV show, through the endorsements, a
12 combination of those, or what?

13 A So, for most of our marriage, the income was split,
14 probably 50/50. We weren't making a lot at all. I was being
15 paid as a pastor. And then we would get income from the show,
16 but it wasn't consistent.

17 Since moving to California, because I've taken on a
18 different role with, you know, where I'm not pastoring full-
19 time -- an assistant job isn't like, you know, great pay or
20 whatever. Jinger has taken more prerogative to do some of
21 those paid partnerships. And I -- I'm not certain, but I think
22 that's where the majority would come from. I think the show
23 money has probably stayed relatively the same.

24

25 Q What do you -- what do y'all make from the show, if you

1 know?

2 A I don't know that.

3 Q A ballpark -- ballpark here, too.

4 A Yeah. It's not a lot. I remember estimating it a few
5 years ago that it was the same as an employee at McDonald's,
6 but it's not a lot. Maybe 2-3,000, something like that, per
7 episode, and then there's not a ton of episodes. So, yeah. I
8 would have to ballpark you on that one.

9 Q Is the 2-3,000 -- is that for each of you, or is it
10 combined?

11 A No. I think -- I would say probably combined. It might
12 be like 1,500 each per episode. Something like that.

13 Q Yeah. Okay. To your understanding, are Jim Bob and
14 Michelle making more than others on the show or less?

15 A I'm not sure.

16 Q Okay. Has Jinger expressed to you that she sees her
17 father as more legalistic than she is?

18 A That's an interesting question the way you worded that.
19 Can you reword it?

20 Q Sure. Well, has Jinger ever described her father as
21 legalistic?

22 A I don't believe in those words.

23 Q Okay. How has she described her father?

24 A In a lot of ways.

25 Q They're on good terms, aren't they?

1 A Yes. But I think you shared with us before that some of
2 his and Michelle's convictions aren't shared by you and Jinger,
3 right?

4 A Yes.

5 Q Has that mostly been okay, or have there been
6 confrontations or disputes about those differences and
7 convictions?

8 A Wow. We're in the land of subjectivity here. I would
9 say, you know, I don't -- I don't know if I share exact
10 convictions on everything with anybody. You know, people are
11 so complex. I would say it's been okay. I mean, it's -- we're
12 adults. We can talk about different things.

13 Q Yeah. It hasn't caused any estrangement in the
14 relationship, though, from your perspective.

15 A What do you mean by estrangement?

16 Q Has there been more distance? And obviously, there's more
17 physical distance since you moved to California. Is there more
18 emotional distance between Jinger and her parents than there
19 was before you moved to California?

20 A There -- perhaps. I think, though, diagnosing that would
21 be difficult. I think as you grow and have your own family,
22 kids, and life --

23 Q Sure.

24 A -- you know, you go from, like, seeing everyone every day
25 to talking to everyone every day to, you know, that's just

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1 Q Okay. I understand. So, and we're -- and we're talking
2 about the official release done by the City that was sent. I
3 understand that. But do you have any information or do you
4 believe that anything was leaked or sent out in any other way?

5 A Other than?

6 Q Other than the response to the FOIA request?

7 MR. BLEDSOE: Object to the form.

8 A Again, I would need to sit down and look at every single
9 piece before answering the question fully.

10 Q Okay. Well, you're not answering my question, but -- so,
11 I'm just -- I have to assume that you don't have any
12 information about that if you're not able to tell me today.

13 MR. BLEDSOE: That's not a question.

14 Q Is that a fair thing to do?

15 MR. BLEDSOE: Object to the form.

16 A Yeah. I can't control assumptions people make.

17 Q I'm not asking about anybody but you.

18 MR. BLEDSOE: Object to the form.

19 A Your question was whether it's fair to -- for you to make
20 assumptions regarding me, and I can't control assumptions.

21 Q Okay. What -- in your faith, what is the role of women,
22 or how is that defined?

23 MR. BLEDSOE: Object to the form.

24 A That's a massive question. I could walk through Scripture
25 from Genesis to Revelation and talk about women if you would

1 like, but it would take quite a bit of time.

2 Q Well, does -- could you summarize how your church views
3 women's roles?

4 MR. BLEDSOE: Object to the form.

5 A Yeah. Women are -- are made in God's image as men are and
6 are amazing. And you'd have to ask a lot more specific
7 questions about -- you know, that's a massive question about
8 thoughts on women. In short, I'd say they're made in God's
9 image and reflect His glory.

10 Q Do you have an understanding of what a woman's role is in
11 Jim Bob and Michelle's religion?

12 A I would need to speak with them about that.

13 Q Do you know what their religion is?

14 A Broadly Christian, they would categorize themselves.

15 Q Is there a more specific -- I don't know the right word --
16 more specific church or belief system? I understand we're
17 under the umbrella of Christianity.

18 A Yeah.

19 Q Can you be more specific?

20 A There's so many umbrellas. I guess independent --
21 independent Baptists, but they might say no to that, so I would
22 ask them that.

23 Q Okay. And what is -- what is -- what would you describe
24 yours as?

25 A So many labels -- reformed and Baptist. Yeah,

1 independent Bible, which is different than independent Baptist.
2 There's a lot of labels in the world. So, yeah, reformed,
3 Baptistic. Evangelical is a term that might be helpful.

4 Q Okay. Have you ever heard any rumors about Kathy
5 O'Kelley's sexuality?

6 A Not that I can recall.

7 Q Have you ever read anything about rumors about her
8 sexuality?

9 A Not that I can recall.

10 Q Have you -- do you know Kathy O'Kelley?

11 A I don't believe so.

12 Q Do you know Ernest Cate?

13 A I don't believe so.

14 Q And can you tell me --

15 A On a personal level, I'm assuming.

16 Q Right. I mean, you've never met him that you know of,
17 right?

18 A Not that I know of.

19 Q Can you tell me what you believe each of them did to hurt
20 your wife?

21 A Contributing in the release of information about her
22 private life.

23 Q And you believe that both of them did the same thing or
24 that each of them had different roles?

25 A I would need to review the very specific case details to

C E R T I F I C A T E

STATE OF ARKANSAS)

) ss

COUNTY OF INDEPENDENCE)

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WITNESS MY HAND AND SEAL this 10th day of June, 2021.

STEPHANIE HENDRICKS, CCR, CVR

Certified Court Reporter #827

My Commission Expires: 08/31/30